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June 13, 2003

Docket ID No. OAR-2002-0053

Standards of Performance for Stationary Gas Turbines; Direct Final Rule and Proposed Rule

Air and Radiation Docket and Information Center

U.S. EPA

Mail Code: 6102T

1200 Pennsylvania Ave, NW Washington, DC. 20460

The Gas Turbine Association, GTA, offers the following suggestions regarding the proposed NSPS changes. Our primary concern is with the definition of the fuel bound nitrogen. GTA believes that a more precise definition of Fuel-Bound Nitrogen should be added to the definitions in section 60.331. This is necessary to clearly define the Fuel-Bound Nitrogen Allowance for units that will to operate on gaseous fuels, but where the gas is not a typical natural gas type fuel.

If you have any questions regarding these comments, please contact Jeff Abboud at (703) 623-0698 and abboud@gasturbine.org. Or contact the chairman of the Environmental Affairs Committee, Mr. Bruce Rising at 407.736.5378.

Thank you for your consideration of this important matter.

Respectfully,

Ieff Abboud

Executive Director

CC:

Jaime Pagan

Combustion Group

Emission Standards Divistion